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Attorney for Defendant, Demetrious Polychron

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION**

THE TOLKIEN TRUST and THE TOLKIEN  
ESTATE LTD,

Plaintiffs,

vs.

DEMETRIOUS POLYCHRON,

Defendant.

Case No.: 2:23-cv-04300-SVW(Ex)

**KATIE CHARLESTON'S  
DECLARATION IN SUPPORT  
OF UNOPPOSED MOTION TO  
CONTINUE HEARING ON  
PLAINTIFFS' MOTION FOR  
SUMMARY JUDGMENT**

**DECLARATION OF KATIE CHARLESTON**

1 I, Katie M. Charleston, declare as follows:

2 1. I am the attorney of record for Defendant Demetrious Polychron  
3 (“Defendant”). I have personal knowledge of the matters contained in this declaration and,  
4 if called as a witness to testify, I could and would competently testify to them.

5 2. On August 31, 2023, I filed a motion to withdraw from this matter due to the  
6 breakdown of the attorney-client relationship and the failure of the Defendant to make  
7 payments for services rendered, thereby causing a financial hardship. The Motion is set  
8 for hearing on October 2, 2023.

9 3. On September 7, 2023, the Court ordered the undersigned and Defendant to  
10 appear in-person for the October 2 hearing.

11 4. On September 14, 2023, the undersigned filed Defendant’s Request for  
12 Remote Appearance. This request is still pending before the Court.

13 5. On September 18, 2023, Plaintiffs filed their Motion for Summary Judgment,  
14 currently set for October 16, 2023.

15 6. Defendant’s opposition to this motion is due on September 25, 2023.

16 7. The undersigned seeks a continuance on the hearing as set and the Defendant’s  
17 time to respond for 30 days, following the Court’s ruling on the undersigned’s motion to  
18 withdraw.

19 8. The undersigned cannot continue to represent the interests of Defendant due  
20 to the breakdown of the attorney-client relationship and the financial hardship that  
21 Defendant’s counsel has and will continue to suffer in further representation.

22 9. The undersigned seeks to protect the Defendant’s interests and his ability to  
23 defend the filed motion pro se or with the assistance of another attorney.

24 10. Plaintiffs’ counsel was contacted regarding this continuance, and they have  
25 no objection.

26 11. For these reasons, the undersigned requests a continuance of the hearing on  
27 the Plaintiffs’ Motion for Summary Judgment and the Defendant’s time to respond.

28 I declare under penalty of perjury under the laws of the State of California that the

**DECLARATION OF KATIE CHARLESTON**

1 foregoing is true and correct.

2  
3 Dated: September 22, 2023

/s/ Katie Charleston

4 Katie Charleston, Esq.  
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**DECLARATION OF KATIE CHARLESTON**